

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.,

Plaintiff,

v.

JOSEPH T. MASRUD,

Defendant.

Civil Action No.

DECLARATION OF DAVID COLLINS

I, David Collins, of full age, hereby declare, under penalty of perjury, as follows:

1. I am the Forensic Analyst for KLDDiscovery Ontrack, LLC (“KLD”), located in Ambler, Pennsylvania. I have more than four years of experience in digital computer forensics, including Departing Employee Triage (“DET”) using forensic analysis of hard drives, servers, mobile devices, tablets, cloud storage, back-up media, social media and individual electronic documents. KLD provides electronic discovery (e-discovery) management solutions to law firms, corporations, and government agencies.

2. Polysciences, Inc. (“Polysciences”) retained KLD to, among other things, forensically image and conduct a DET preliminary examination and analysis of data located on the laptop of a former employee, Joseph Masrud (the “Laptop”). Our preliminary analysis focused on the weeks leading up to Mr. Masrud’s September 6, 2019 departure from Polysciences and his later return of the Laptop to Polysciences, and on the following analyses: (a) analysis of any and all USB storage devices that may have been connected to the Laptop; (b) a “Jump List Analysis” to provide indications of access to specific files and resources found on the Laptop; (c) an “LNK Analysis” to discover “link files to show certain files were opened and accessed at certain points in time; (c) an “MRU analysis” of “Most Recently Used” files and programs; (d) a “Shellbag

Analysis” to determine folders that have been opened and closed in Windows Explorer; (e) A “VSC Differential Analysis” to identify recently modified documents; (f) a “Web History Analysis” analysis on browser software used on the Laptop; (g) review of email files to determine outgoing and incoming email from business and personal accounts; (h) “Mass Deletion/Wiping” analysis to determine an effort to clear data existence or data history; and (i) related forensics on the Laptop.

3. KLD’s analysis of the Laptop has preliminary determined that (5) external storage devices, including external hard drives and USB flash drives, were attached to the Laptop, identified below:

Serial/UID	Description	First Connected (EST/EDT)	Last Connected (EST/EDT)	Last Disconnected (EST/EDT)
058F84688461	Generic- SD/MMC USB Device	5/14/2019 20:44	7/17/2019 16:30	7/18/2019 17:07
0707380B9CD74E92	USB DISK 3.0 USB Device	5/22/2019 1:33		5/22/2019 1:33
07089172CC907089	BUFFALO USB Flash Disk USB Device	5/21/2019 2:22		5/21/2019 2:22
26C1400210210076	ELECOM MF-KCU3 USB Device	5/21/2019 2:10		5/21/2019 2:11
a&36d08e73	GENERAL UDISK			5/24/2018 23:00

4. KLD’s analysis of the Laptop has preliminary determined that Mr. Masrud, on September 10, 2019, four days after his termination, accessed files contained in folders named “Website,” “Desktop,” “Outlook Files,” and “Documents,” identified below:

Linked File Name	Last Access Date/Time - (UTC-5:00) (MM/dd/yyyy)	Linked Path
Website	9/10/19 3:30 PM	\\USWARFS03\USERS\$\jmasrud\Documents\Website
Desktop	9/10/19 3:26 PM	\\USWARFS03\USERS\$\jmasrud\Desktop
Outlook Files	9/10/19 2:55 PM	\\USWARFS03\USERS\$\jmasrud\Documents\Outlook Files
Documents	9/10/19 2:55 PM	\\USWARFS03\USERS\$\jmasrud\Documents

5. According to KLD’s LNK Analysis, Mr. Masrud, on September 10, 2019, accessed files with the Source File Name “Questions.docx.LNK,” “leads.xlsx.LNK,” “Sale18.xlsx.LNK,” and PERSONAL.XLSB.LNK,” identified below:

Source File Name	Source Last-Accessed	Target File Path
Questions.docx.LNK	9/10/19 3:31 PM	\\USWARFS03\USERS\$\jmasrud\Documents\New Products\PEI\Questions.docx
Leads.xlsx.LNK	9/10/19 3:30 PM	\\USWARFS03\USERS\$\jmasrud\Documents\New Products\PEI\Leads.xlsx
Sale18.xlsx.LNK	9/10/19 3:21 PM	\\USWARFS03\USERS\$\jmasrud\Documents\Business Plans\Business Plans\2019\Sale18.xlsx
PERSONAL.XLSB.LNK	9/10/19 3:21 PM	
Transfectol.doc.LNK	9/10/19 2:55 PM	\\USWARFS03\USERS\$\jmasrud\Documents\New Products\Transporter 5 Transfection\Transfectol.doc

6. According to KLD's "Shellbag Analysis" Mr. Masrud interacted with a number of directories listed below on the dates indicated:

Varid	Accessed path	First interacted	Last interacted
Jmasrud	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud		9/10/19 3:32 PM
\\uswarfs03\users\$	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$		9/10/19 3:32 PM
Sync Results Delegate Folder	Desktop\Control Panel\All Control Panel Items\Sync Center Folder\Sync Results Delegate Folder	5/29/19 8:15 AM	9/10/19 3:31 PM
Documents	Desktop\My Computer\C:\Users\jmasrud\Documents	9/10/19 3:00 PM	9/10/19 3:29 PM
Intel	Desktop\My Computer\C:\Users\jmasrud\Roaming\Intel	9/10/19 3:29 PM	9/10/19 3:29 PM
Users	Desktop\My Computer\C:\Users		9/10/19 3:27 PM
Aragen Data	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Aragen Data	9/10/19 2:47 PM	9/10/19 3:16 PM
Aragen Data	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Aragen Data	9/10/19 2:48 PM	9/10/19 3:16 PM
PEI	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI		9/10/19 3:16 PM
PEI	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI		9/10/19 3:16 PM
New Products	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products		9/10/19 3:16 PM
Taiwan Sales	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Reports\Sales\Taiwan Sales		9/10/19 3:07 PM
4	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Reports\Sales\LP Combined\2019\4	5/29/19 8:15 AM	9/10/19 3:06 PM
	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Reports\Sales\LP Combined\2019\4	5/29/19 8:15 AM	9/10/19 3:06 PM
Documents	Desktop\My Computer\Documents		9/10/19 3:00 PM
Sync Center Folder	Desktop\Control Panel\All Control Panel Items\Sync Center Folder		9/10/19 2:59 PM
All Control Panel Items	Desktop\Control Panel\All Control Panel Items		9/10/19 2:59 PM
Website	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Projects\Website	9/10/19 2:57 PM	9/10/19 2:57 PM
Website	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Projects\Website	5/29/19 8:15 AM	9/10/19 2:57 PM
Bionique	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Analytical Testing\Bionique	6/26/19 3:11 PM	9/10/19 2:52 PM
Bionique	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Analytical Testing\Bionique	6/26/19 3:10 PM	9/10/19 2:52 PM
McDay	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Marketing\McDay	9/10/19 2:47 PM	9/10/19 2:47 PM
McDay	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Marketing\McDay	9/10/19 2:47 PM	9/10/19 2:47 PM
2010 Coating Process Fundamentals Short Course	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Literature\2010 Coating Process Fundamentals Short Course	9/10/19 2:46 PM	9/10/19 2:46 PM
2010 Coating Process Fundamentals Short Course	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Literature\2010 Coating Process Fundamentals Short Course	9/10/19 2:46 PM	9/10/19 2:46 PM
2019	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Business Plans\Business Plans\2019	5/29/19 8:15 AM	9/10/19 2:42 PM
Business Plans	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Business Plans\Business Plans		9/10/19 2:42 PM
2019	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Business Plans\Business Plans\2019	5/29/19 8:15 AM	9/10/19 2:42 PM
Business Plans	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Business Plans\Business Plans		9/10/19 2:42 PM
Scorecards	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Administrative\Scorecards		9/10/19 2:42 PM
Scorecards	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Administrative\Scorecards		9/10/19 2:42 PM
2017-9	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Administrative\Allocations\2017-9	9/10/19 2:41 PM	9/10/19 2:41 PM
2017-9	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Administrative\Allocations\2017-9	9/10/19 2:41 PM	9/10/19 2:41 PM
Sell Sheets	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Marketing\Sell Sheets		9/4/19 12:02 PM
Sell Sheets	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Marketing\Sell Sheets		9/4/19 12:02 PM
Sales	Desktop\Computers and Devices\uswarfs03\uswarfs03\users\$\Jmasrud\Documents\Reports\Sales		9/4/19 9:14 AM
Updates	Desktop\My Computer\O:\Joe Masrud\Updates	9/3/19 2:01 PM	9/3/19 2:01 PM
Updates	Desktop\Search Folder\Joe Masrud\Updates	9/3/19 1:35 PM	9/3/19 1:39 PM

7. According to KLD's MRU Analysis, Mr. Masrud accessed a number of word documents on September 10, 2019, including "Questions.docx," "Projects.docx," Transition Plan.docx," "transporter5protocol.docx," "Transfectol.doc," PEI Questions.docx," and "File locations.docx," identified below:

Word
Software\Microsoft\Office\14.0\Word\File MRU
LastWrite Time Tue Sep 10 19:31:03 2019 (UTC)
Item 1 -> \\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\Questions.docx Tue Sep 10 19:31:03 2019
Item 2 -> \\uswarfs03\users\$\Jmasrud\Documents\Projects\Website\Projects.docx Tue Sep 10 18:57:30 2019
Item 3 -> \\uswarfs03\users\$\Jmasrud\Documents\Projects\Remote Transition\Transition Plan.docx Tue Sep 10 18:57:15 2019
Item 4 -> \\uswarfs03\users\$\Jmasrud\Documents\New Products\Transporter 5 Transfection\transporter5protocol.docx Tue Sep 10 18:55:20 2019
Item 5 -> \\uswarfs03\users\$\Jmasrud\Documents\New Products\Transporter 5 Transfection\Transfectol.doc Tue Sep 10 18:55:09 2019
Item 6 -> \\uswarfs03\users\$\Jmasrud\Documents\New Products\PEI\PEI Questions.docx Tue Sep 10 18:53:50 2019
Item 7 -> \\uswarfs03\users\$\Jmasrud\Documents\Marketing\Marketing Administration\File Locations.docx Tue Sep 10 18:47:17 2019

8. According to our File Listing Analysis, an outlook archive file named "archive2017.pst," identified below and found in Mr. Masrud's user folder, was modified:

Name	File Ext	Is Deleted	Logical Size	Entry Modified	File Created	Last Written
archive2017.pst	pst		2,365,580.288	9/10/19 3:04 PM	1/2/18 2:43 PM	9/10/19 3:04 PM


9. According to KLD's VSC Differential Analysis, an outlook "OST" file, which stores Outlook mailbox information, was deleted on or about September 13, 2019, identified below:

Name	File Ext	Is Deleted	Logical Size	Entry Modified	File Created	Last Written
joseph.masrud@polysciences.com.ost	ost	•	0	9/13/19 11:20 AM	5/11/17 7:49 AM	9/13/19 11:20 AM

10. According to our Web History Analysis, on September 13, 2019, all of Mr. Masrud's Chrome settings, data and history were deleted, as identified below:

URL	Last Visited Date/Time - (UTC-5:00)
chrome://settings/	9/13/19 12:09 PM
chrome://settings/clearBrowserData	9/13/19 12:09 PM
https://www.google.com/?gws_rd=ssl	9/13/19 12:09 PM
chrome://history/	9/13/19 12:09 PM

Dated: September 3, 2020

By:  _____